

EXHIBIT 2

From: [Vicky Sims](#)
To: ["Kaiser, Steven J."; "mmulqueen@bakerdonelson.com"](#)
Cc: [Veronica Bosco](#); [Katie Van Dyck](#); [Mark R. Suter](#); [Eric L. Cramer](#); [Karen Garvey](#)
Subject: RE: Fusion Elite All Stars v. Varsity Brands, LLC
Date: Friday, May 21, 2021 11:02:00 AM

Steve,

We write to follow up on the below. Please let us know when we may expect a response to the below inquiries.

We also write to follow up on the issue of the time period for Varsity's data production. You previously requested confirmation that if Varsity produced the requested data back to 2011, parties in the related cases before Judge Lipman would not seek a more expanded set of All Star Apparel and Competition data. We have now obtained that agreement. Plaintiffs in the *American Spirit* and *Jones* cases agree to accept the same All Star Apparel and Competition data as Plaintiffs in *Fusion Elite All Stars*, provided the time period is expanded back to 2011. Plaintiffs are willing to discuss adjusting this time period for any particular categories of data for which there is significant burden associated with going back to 2011.

All parties will, of course, retain the right to ask questions about the data, and we will coordinate those questions, to the best of our ability, as we are already coordinating our data analyses.

Please advise whether this resolves the data time period issue. We are available to discuss at your convenience. We believe that reaching agreement on the data may also enable us to reach agreement on a number of the other outstanding discovery disputes.

From: Vicky Sims
Sent: Friday, April 23, 2021 4:11 PM
To: Kaiser, Steven J. <skaiser@cgsh.com>; mmulqueen@bakerdonelson.com
Cc: Veronica Bosco <VBosco@labaton.com>; Katie Van Dyck <kvandyck@cuneolaw.com>; Mark R. Suter <msuter@bm.net>; Eric L. Cramer <ecramer@bm.net>; Karin Garvey (<KGarvey@labaton.com>)
Subject: Fusion Elite All Stars v. Varsity Brands, LLC

Counsel,

Thank you for your data productions. We appreciate Defendants' productions, and seek the adjustments noted below.

1. Please produce all transactional data, rebate data, spectator fee data, general ledger and cost data back to 2011. As we stated on our calls, the other groups share our view that the data production must go back to 2011.
2. Please provide team-level transactional data to the extent it exists
3. Please provide item-level data, in addition to order-level transactional data for apparel sales, as indicated in your sample